

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

WAYAN GARVEY, *on behalf of himself and all
others similarly situated,*

Plaintiff,

v.

KELLER WILLIAMS REALTY, INC. and
BRITNEY GAITAN,

Defendants.

Case No.: 2:23-cv-00920-APG-DJA

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
DEFENDANTS KELLER WILLIAMS
TO RESPOND TO PLAINTIFF’S
COMPLAINT**

[SECOND REQUEST]

Plaintiff WAYAN GARVEY (“Plaintiff”) by and through his counsel Craig K. Perry, Esq. of CRAIG K. PERRY & ASSOCIATES, Chris R. Miltenberger, Esq. of THE LAW OFFICE OF CHRIS R. MILTENBERGER, PLLC, and Eric H. Weitz, Esq. and Max S. Morgan, Esq. of THE WEITZ FIRM LLC, and Defendant KELLER WILLIAMS REALTY, INC., by and through its counsel Michael Ayers, Esq., Clark Vellis, Esq. and Lauren Calvert, Esq., of QUINTAIROS, PRIETO, WOOD & BOYER, P.A. (“Defendant KELLER WILLIAMS”), hereby stipulate as follows:

1. On June 12, 2023, Plaintiff filed the Complaint – Class Action (the “Complaint”) in the United States District Court, District of Nevada (ECF No. 1).

2. Defendant KELLER WILLIAMS was served with the Summons and Complaint on June 15, 2023 (ECF No. 10).

3. Defendant KELLER WILLIAMS was required to file a responsive pleading to the Complaint within twenty-one (21) days of its service thereof, i.e., July 6, 2022.

4. Counsel for Defendant KELLER WILLIAMS was only just retained by Defendant KELLER WILLIAMS on August 15, 2023.

5. Counsel for Defendant KELLER WILLIAMS contacted counsel for Plaintiff and informed them that his firm had only just been assigned the defense of this matter on August 15, 2023, and that his firm required additional time within which to review this matter and formulate its defense.

6. The first stipulation for extension of time was granted by this Court on August 23, 2023 (ECF 21) and this is the second stipulation for extension of time for Defendant KELLER WILLIAMS to respond to Plaintiff's Complaint (ECF No. 1).

7. Counsel for Defendant KELLER WILLIAMS contacted counsel for Plaintiff again and informed him that he will be requesting *pro hac vice* admission for Chicago co-counsel to appear, and requested additional time to file a responsive pleading in order to accomplish that request for admission.

6. Accordingly, Plaintiff and Defendant KELLER WILLIAMS hereby stipulate to extend Defendant KELLER WILLIAMS' deadline to file its responsive pleading in this matter until and including September 27, 2023.

This second request for extension of time to respond is being made in good faith and not for the purpose of undue delay. No further extensions are contemplated.

IT IS SO STIPULATED.

DATED this 8th day of September, 2023.

DATED this 8th day of September, 2023.

CRAIG K. PERRY & ASSOCIATES

QUINTAIROS, PRIETO, WOOD & BOYER, P.A.

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Attorneys for Defendant
 KELLER WILLIAMS REALTY, INC.

ORDER

The Stipulation to Extend Deadline for Defendant KELLER WILLIAMS to Respond to Plaintiff's Complaint up to and including September 27, 2023, is so ORDERED AND ADJUDGED.

DATED: September 11, 2023


UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on this date, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF System and through that service, a copy was sent with e-notice to all parties.

Dated: September 8, 2023

/s/ Christine L. Miller
An Employee of QUINTAIROS,
PRIETO, WOOD & BOYER, P.A.